

Table II
Identification of Achievable Performance Standards
Source Category: Polymeric Foam Product Manufacturing

Rule/Measure	Rule/Measure				
	SCAQMD Rule 1175 Control of Emissions From The Manufacture of Polymeric Cellular (Foam) Products Adopted 11/3/89, Last amendment 5/13/94	SJUAPCD Rule 4682 Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing Adopted 5/21/92, Last amendment 6/16/94	SDAPCD Rule 67.22 Expandable Polystyrene Foam Products Manufacturing Operations Adopted 6/7/94 Last amendment 5/15/96		
Exemptions	<p>The emission control requirements of this rule shall not apply to any:</p> <p>(A) Expandable polystyrene operation that processes less than 200 pounds per day of raw material.</p> <p>(B) Rigid polyurethane operation that processes less than 1,000 pounds per day of raw material.</p> <p>The venting of emissions from the final manufactured product shall not apply to any facility that only manufactures:</p> <p>(A) rigid polyurethane foam; or</p> <p>(B) EPS foam and the highest concentration of the blowing agent in the cellular product is 1.8 percent or less by weight within 15 minutes of completion of the manufacturing operation. Verification of the concentration shall be demonstrated annually, pursuant to a protocol submitted to the District and subject to approval by the Executive Officer.</p>	<p>The provisions that require use of one of the following: A blowing agent other than a VOC or CFC 11 or CFC; or a collection system that achieves at least 90 % capture efficiency and 95% destruction efficiency; or by a method that achieves emission reductions equivalent to the collection system shall not apply to manufacturing and processing operations using polymeric materials containing less than 1 percent volatile organic compounds by weight, and not using a blowing agent in their process.</p> <p>However, the rule does not contain any provision (test methods or procedures) to verify the VOC content of polymeric materials.</p>	<p>The requirements that a person shall not manufacture EPS foam products unless VOC emissions from such manufacture do not exceed 3.0 pounds per 100 pounds of EPS raw polymeric materials used; or the raw polymeric materials used for such manufacture contain no more than 3.6 percent by weight of blowing agent, as indicated in product specifications from the manufacturer of the raw polymeric material</p> <p>shall not apply to any stationary source with uncontrolled VOC emissions of less than 50 tons per calendar year from EPS foam products manufacturing operations.</p> <p>The Calculations of VOC emissions shall be determined by multiplying the quantity of EPS foam products produced</p>		

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			by the difference between the blowing agent content of the raw polymeric materials and that of the final EPS foam products, as determined after 24 hours of storage.		
Applicability	This rule shall apply to polymeric cellular products manufacturing operations including but not limited to expandable polystyrene, polystyrene foam extrusion, polyurethane, isocyanurate and phenolic foam operations. All steps of the manufacturing operation and the storage of the final product for a maximum of 48 hours are subject to the requirements of this rule.	The provisions of this rule shall apply to any polystyrene foam, polyethylene, and polypropylene manufacturing and processing operations.	Except as otherwise provided in the exemptions mentioned above, this rule is applicable to any person who manufactures expandable polystyrene (EPS) foam products using volatile organic compounds (VOC's) as blowing agents. EPS foam products manufacturing operations subject to this rule shall not be subject to Rule 66.		

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Comments	<p>Overall this rule is more effective in reducing emissions at any given manufacturing operation. All sources of manufacturing emissions are controlled by the approved emissions control device (95%, by weight) and the collection system (90%, by weight).</p> <p>**None of the rules account for all of the post-manufacturing emissions, i.e., offsite emissions from finished products.</p>	<p>This rule appears to have the same emissions control system requirements as the SCAQMD Rule 1175. However, Rule 4682 does not require collection and destruction of emissions from other significant sources of emissions. Most of the emissions from these types of operations are fugitive emissions. This rule excludes a number of sources of emissions, such as storage of finished products, curing areas and others. Further, the staff report stated that all sources were in compliance with this rule prior to its adoption. Therefore, this rule has no emission reduction potential in this district.</p>	<p>The staff report stated this rule would only apply directly to one facility in the District. The rule proposed two options that were technically and economically feasible. One would realize an annual reduction in emissions of 81%, and the other would realize an annual reduction in emissions of 40%. The district chose the lower percent reduction option.</p>		

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